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11 IN THE UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA

13
14 UNITED STATES OF AMERICA,
v.
Plaintiff,
APPROXIMATELY \$20,000.00 IN
U.S. CURRENCY,
Defendant.

15 2:22-MC-00062-KJM-AC

16 STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America and potential claimant Jose
18 Garcia (“claimant”), appearing in propria persona, hereby agree and STIPULATE as follows:

19 1. On or about November 11, 2021, claimant filed a claim in the administrative forfeiture
20 proceeding with the United States Postal Inspection Service (“USPIS”) with respect to the Approximately
21 \$20,000.00 in U.S. Currency (hereafter “defendant currency”), which was seized on August 31, 2021.

22 2. The USPIS has sent the written notice of intent to forfeit required by 18 U.S.C. §
23 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the
24 defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim
25 to the defendant currency as required by law in the administrative forfeiture proceeding.

26 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
27 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency
28 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture

1 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.
2 That deadline was February 9, 2022.

3 4. By Stipulation and Order filed February 8, 2022, the parties stipulated to extend to March
4 11, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
5 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
6 forfeiture.

7 5. By Stipulation and Order filed March 15, 2022, the parties stipulated to extend to April 11,
8 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
9 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
10 forfeiture.

11 6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to May
12 11, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
13 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
14 forfeiture.

15 7. Accordingly, the parties agree that the deadline by which the United States shall be required
16 to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that
17 the defendant currency is subject to forfeiture shall be extended to May 11, 2022.

19 Dated: 04/11/22

PHILLIP A. TALBERT
United States Attorney

20 By: /s/ Kevin C. Khasigian
21 KEVIN C. KHASIGIAN
22 Assistant United States Attorney

24 Dated: 04/11/22

/s/ Jose Garcia
JOSE GARCIA
Potential Claimant
Appearing *in propria persona*

(Signature authorized by phone)

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IT IS SO ORDERED.
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DATED: April 25, 2022.
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CHIEF UNITED STATES DISTRICT JUDGE
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